

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY - CAMDEN VICINAGE**

**IN RE: VALSARTAN N-
NITROSODIMETHYLAMINE
(NDMA) CONTAMINATION PRODUCTS
LIABILITY LITIGATION**

:
:
: **MDL No. 2875**
:
: Hon. Robert B. Kugler
: District Court Judge
:
: Hon. Joel Scheider
: Magistrate Judge

This document relates to:
Troiano v. Aurobindo Pharma, et al.
Case No: 1:20-cv-02341-RBK-JS

MOTION TO SUBSTITUTE PARTIES

COME NOW, Plaintiff John H. Troiano, by and through undersigned counsel, pursuant to F.R.C.P. 25(a)(1) and moves this Honorable Court to substitute John H. Troiano, Administrator of the Estate of Diane Troiano, as Plaintiff for decedent, Diane Troiano. As grounds for said Motion, Plaintiff avers as follows:

1. Plaintiffs Diane Troiano and John Troiano filed their original complaint against Defendants on or about March 4, 2020 in the United States District Court for the District of New Jersey.
2. During the pendency of this lawsuit, Plaintiff Diane Troiano died on or about November 3, 2020 of colorectal cancer.
3. A Notice of Death was filed with this Court on December 30, 2020.
4. Plaintiff John H. Troiano, husband of decedent Diane Troiano, was appointed as Administrator of the Estate of Diane Troiano by the Surrogate Court of Gloucester County, New Jersey on December 10, 2020. A copy of the Letters of Administration and Short Certificate are attached hereto as Exhibit A.

5. Under New Jersey Law, the filed personal injury claims of decedent Diane Troiano survive her death and may be prosecuted by her estate along with, *inter alia*, claims for wrongful death.

WHEREFORE, Plaintiff John Troiano, who has been appointed Administrator of the Estate of Diane Troiano, moves the Court to enter an Order substituting John Troiano as Administrator of the Estate of Diane Troiano for the decedent, Diane Troiano. A Proposed Order is filed herewith.

Date: December 30, 2020

Respectfully submitted,

/s/ Michael C. Schafle

Michael C. Schafle, Esquire

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on or about December 30, 2020, I electronically filed the foregoing Motion to Substitute Parties with the Clerk of Court using the CM/ECF System which will forward notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Michael C. Schafle

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